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TEHACHAPI-CUMMINGS COUNTY WATER DISTRICT

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March 5, 1999

Mr. Steve Ritchie
Deputy Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Ritchie:

In regard to CALFED'S water use efficiency common program and the proposed certification process, this District appreciates very much the recent series of workshops held by CALFED concerning urban water use efficiency.

The Tehachapi-Cummings County Water District is a member unit of the Kern County Water Agency and is a wholesaler of municipal/industrial water as well as an agricultural water purveyor. The District's wholesale customers include The City of Tehachapi, Stallion Springs CSD, Golden Hills CSD, California Department of Corrections and Bear Valley CSD. As you are aware, Bear Valley is already involved in CALFED's urban water use efficiency program. While all of our water purveying customers individually serve less than 3,000 connections, they have all indicated a desire to sign the Memorandum of Understanding regarding urban water conservation.

The Tehachapi-Cummings County Water District wishes to participate as a wholesaler in the program and therefore offers its comments in this regard at this time.

This District is the importer of State Project Water and manages three groundwater basins under the continuing jurisdiction of the Court. The District's water deliveries are all metered, including deliveries of groundwater for both municipal/industrial and agricultural use. There is an injunction against overdraft in the three managed groundwater basins and there is a mandatory metering of groundwater pumped in the Tehachapi Basin, including the requirement of monthly groundwater production reports to be filed with this District as Watermaster for the Court. For the last several years, we have been involved in conjunctive use programs in the Tehachapi Basin and Cummings Basin. This District has been a leader in water use management and had its own groundwater banking and drought management program for the past 25 years. It has always been our desire to exercise "best management practices".

While we intend to continue to implement best management practices pertinent to wholesalers under CALFED's MOU, the retailers within our service area have asked that we not take on the role of policing their water conservation programs.

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In reference to the Kern County Water Agency letter to you dated February 25, 1999, the Agency made several comments on issues involving the urban water use efficiency component. This District supports and concurs with the Agency's statements therein particularly in regard to the use of environmental costs and benefits in the cost effectiveness analysis used to determine which urban best management practices will be implemented by water supplier. We are also very much concerned with the method to be used in selecting members of the certification review committee. The Certification Review Committee must be technically competent and without political interference to make the process objective and fair. Finally, we believe that CALFED's proposed water base sanctions, if finally adopted, will most certainly penalize agencies who are attempting to practice common sense water management. We will continue to coordinate our efforts involving CALFED's water use efficiency program with the Kern County Water Agency and our own constituents. We appreciate this opportunity to submit our comments.

Please feel free to contact us should you have any questions.

Yours truly,



Robert J. Jasper
General Manager

cc: James R. Parker, Jr.
John Yeakley, General Manager, BVCSD
Jason Caudle, Manager, City of Tehachapi
Bill Fisher, Acting General Manager, GHCSO
David Aranda, District Manager, SSCSD